

REMARKS

This amendment is in response to the Office Action of February 8, 2006 in which claims 1-4 were allowed, claim 5 was rejected and claims 22-24, 26 and 28-32 were objected to.

Regarding the rejection of claim 5 under 35 U.S.C. §103(a) as being unpatentable over Yasumaru et al (US 5,662,523) in view of Jarrett (US 5,252,070), the Examiner has given the claim an interpretation which requires both the active mode and the passive mode to be operative at the same time. Even though Applicant's disclosure discloses a selectable active or passive mode display device, Applicant does not wish to create an estoppel by arguing against the Examiner's interpretation of the claim language. Therefore, the rejection will be addressed without contesting this interpretation.

Even with this interpretation, the language of the first element of claim 5 still requires the n-axis display platform to be responsive in the passive mode to an attitudinal control signal, for mechanically *guiding* the user's head to execute attitudinal movements. The Examiner points to Fig. 11 of Yasumaru et al and the text thereof at column 9, line 55 through column 10, line 43. In particular, in Fig. 11 (2) the user 0 on the left hand side is shown turning his head attitudinally to the right while the user to his right, i.e., user 1, is shown keeping his head straight in the same position as shown in Fig. 11 (1). In this "passive mode" for user 1, as postulated by the Examiner, the image shown in Fig. 12 (2) is presented through the eyes of user 1 wherein the turning of the head of user 0 is illustrated to user 1 in the lower left hand corner of his field of view. This is different from that shown in Fig. 12 (1) where the nose of the user 0 is not shown. Thus, according to the interpretation of the Examiner, user 1 in a passive mode is presented with movement of the user 0's head which "guides" user 1's head. At the same time, user 1 is engaged in the common game along with the user 0 and his head movements are at the same time monitored so that the proper images are presented to his field of view according to his head

movements. This is the active mode postulated by the Examiner going on at the same time as the passive mode wherein the image of user 0 is presented to the field of view of user 1.

However, Fig. 11 (2) of the Yasumaru et al reference does not actually show the image presented in the lower left hand corner of the field of view of user 1 "guiding" user 1's head to execute attitudinal movements as claimed in claim 5. Although the movements of user 0's head are certainly displayed in the lower left hand corner of the field of view of user 1 as shown in Fig. 12 (2), it is clear that the head of user 1 as shown in Fig. 11(2) while this is going on remains straight ahead. Thus, there is not hint or suggestion within the Yasumaru et al reference that the head of user 1 is guided away from the common game play. As a result, each player enjoys their own unique screen based on their own movement as their own virtual reality (see column 11, lines 1-10).

Thus, not only is the user 1's head not mechanically guided, as admitted by the Examiner, but is not guided at all. Therefore, for this fundamental reason, the correspondence between the first element of claim 5 and the Yasamuru disclosure does not exist even without the "mechanical" limitation.

Regarding the display of Yasamuru et al the Applicant does not disagree with the Examiner's analysis since even though the display is not mechanically connected to the n-axis display platform, claim 5 is not limited to a mechanical connection and Applicant does not wish to create an estoppel by arguing that point.

Regarding the Jarrett et al disclosure, there is no attitudinal control signal in the Jarrett disclosure, contrary to the Examiner's position. The "down" force and "up" force shown in Fig. 2 of Jarrett is representative of an attempt to simulate the apparent weight change (column 1, lines 40-43) of the pilot's headgear under maneuvering loads, i.e., g-forces that would act on the pilot in a complex manner, the major effect of which would be felt in what to him appears to be a vertical line,

the forces acting upwards or downwards depending on the motion of the aircraft. The Jarrett invention seeks to generate such an apparent weight change in a ground-based simulator by applying to the helmet a control vertical force, proportional to the instantaneous incremental load factor of the modeled aircraft. See column 1, lines 40-51. It is stated in Jarrett that for purposes of the aircraft simulator, it is important that normal head movements are not inhibited and that inappropriate rotational torques or lateral and longitudinal forces are not applied. See column 1, lines 59-65.

To achieve the required force *along a single axis* the helmet is linked to a piston rod 15 attached to a piston slideable within a cylinder 14, the force on the piston rod being generated by the differential pressure of fluid within the cylinder on either side of the piston. See column 1, line 66 through column 2, line 2.

In order to retain considerable freedom of movement for the operator, yet be able to exert the required force on the helmet at all times, the means for applying a vertical force to the helmet comprises means for applying a torque to a parallelogram linkage interconnecting the helmet with a fixed support, one side of the linkage being linked to the fixed support and maintained at a constant height while being free to move in a horizontal direction in the opposite side of the linkage being linked to the helmet. By this arrangement, application of a torque to the linkage results in a vertical force being applied to the helmet while accommodating a degree of vertical movement in the helmet.

Please note that all of this is to simulate a g-force, and does not have anything to do with guiding a user's head to execute attitudinal movements which correspond to images displayed in the display. There is no hint or suggestion in Jarrett of mechanically guiding the user's head to execute an attitudinal movement. In fact, Jarrett teaches applying a force along a single, vertical axis, i.e., linearly so that the trainee pilot can experience the g-forces along a vertical line without disturbing the freedom of the trainee pilot to move his head in a normal way. It is completely incorrect for the Examiner to state that Jarrett discloses a head

positioning control device for a flight simulator which detects simulated movement from a user and mechanically guides the user's head according to the attitudinal control signal.

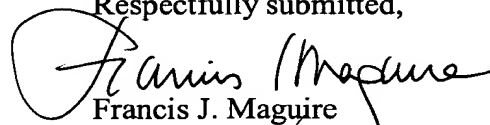
The g-force simulation of Jarrett is generically similar to the BODYSONIC BS device 206 shown in Fig. 7 and also Fig. 5 (BS) as a transducer that reproduces a collision in the game of Yasumaru et al. This is completely extraneous to mechanically guiding the user's head to execute attitudinal movements corresponding to images displayed in the display corresponding to said attitudinal movements.

Therefore, the 35 U.S.C. §103(a) rejection of claim 5 is inapplicable and withdrawal thereof is requested.

New claims 34-40 have been added as dependent claims to claim 5 to claim additional features in a dependent way.

Allowance of claim 5 and new claims 34-40 dependent thereon along with allowed claims 1-4 is earnestly solicited.

Respectfully submitted,



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